

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name The Foschini Group (TFG)
Sector Apparel (supply chain only)
Overall score 4.6 out of 100

Theme score	Out of	For theme
0.8	10	A. Governance and Policy Commitments
0.0	25	B. Embedding Respect and Human Rights Due Diligence
1.5	20	C. Remedies and Grievance Mechanisms
1.4	25	D. Performance: Company Human Rights Practices
0.9	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: General HRs commitment: The Human Rights Statement indicates: ‘This statement is supported by international human rights principles aimed at promoting and protecting human rights including the United Nations Global Compact Principles, the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work and the Universal Declaration of Human Rights’. However, having a statement 'supported by international human rights principles aimed at' is not considered a formal statement of commitment according to CHRB wording criteria. The webpage section Sustainability indicates: ‘TFG is committed to respecting, protecting and advocating for the human rights of all stakeholders who are involved in our operations. As such, we accept our responsibility to support transparency and integrity, to be proactive in resolving problems and to collaborate with others to protect the human and labour rights of workers’. However, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Statement_web, N/A: tfglimited.co.za] & [Sustainability_web, N/A: tfglimited.co.za] • Not Met: Universal Declaration of Human rights (UDHR) • Not Met: International Bill of Human Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to UNGPs • Not Met: Commitment to OECD MNE Guidelines

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to ILO core principles: The Company's Human Rights Statement covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Human Rights Statement_web, N/A: tfglimited.co.za] • Met: Explicitly lists all four ILO core principles: The Company's Human Rights Statement covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it adds: 'Workers must be free to form associations for the protection of their interests and to bargain collectively but are not compelled to do so'. [Human Rights Statement_web, N/A: tfglimited.co.za] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects suppliers to commit to ILO core principles • Not Met: Explicitly lists all four ILO core principles for suppliers: The TFG London Supplier Code of Conduct has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it indicates: 'In order for employees to be able to voice their comments/concerns, suppliers should encourage open communication between workers and management, while respecting the right of employees to associate, organise and bargain collectively. Suppliers must not threaten, penalize, restrict or interfere with employees' lawful efforts to join associations. Workers representatives should not be discriminated against and should be able to carry out their representative functions in the workplace. Where the right of freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. However, TFG London is a Company's segment. No Group-wide formal statement indicating it expects suppliers to respect these rights found. Further, the Company's Human Rights Statement has provisions for its suppliers regarding discrimination and health and safety. However, while the document mentions child labour, forced labour, freedom of association and collective bargaining, these provisions seem to refer to its own operations and the document does not specify that its content are requirements for suppliers. [TFG London Supplier Code of Conduct, N/A: phase-eight.com] & [Human Rights Statement_web, N/A: tfglimited.co.za]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect H&S of workers: The Company has provided comments to CHRB regarding this indicator, however, no publicly available policy statement committing it to respect the health and safety of workers found. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Sustainability_web, N/A: tfglimited.co.za] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The 2022 Inspired Living Report discloses the various policies, certifications and standards, legislations, regulations and principles it complies with. It includes the International Labour Organization obligations. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [2022 Inspiring Living Report, 2022: tfglimited.co.za] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to H&S of workers: The Human Rights Statement indicates: 'Suppliers shall provide a safe and hygienic workplace for their employees ensuring minimum conditions of light, ventilation, hygiene, fire prevention, safety measures and access to drinking water. Where accommodation is provided, it shall be clean and safe. Suppliers shall take the required steps to prevent accidents and injuries from taking place in the workplace'. [Human Rights Statement_web, N/A: tfglimited.co.za] • Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Human Rights Statement indicates: 'Suppliers shall ensure that the hours their employees work complies with applicable laws or any relevant collective agreement'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. TFG London Supplier Code of Conduct as well as

Indicator Code	Indicator name	Score (out of 2)	Explanation
			the TFG London Migrant Workers Employment Policy and Implementation Guidelines contain working hours provisions, however, TFG London is a Company's segment. No Group-wide formal statement of commitment found. [Human Rights Statement_web, N/A: tfglimited.co.za] & [TFG London Supplier Code of Conduct, N/A: phase-eight.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commitment to women's rights • Not Met: Commitment to children's rights: TFG London has published a Young Worker and Child Labour policy. However, it is a Company's segment. No Group-wide formal statement of commitment found. [TFG London Young Worker and Child Labour policy, N/A: phase-eight.com] • Not Met: Commitment to migrant worker's rights: TFG London has published a Migrant Workers Employment Policy and Implementation Guidelines. However, it is a Company's segment. No Group-wide formal statement of commitment found. [TFG London Migrant Workers Employment Policy and Implementation Guidelines, N/A: phase-eight.com] • Not Met: Expects suppliers to respect these rights Score 2 <ul style="list-style-type: none"> • Not Met: Commitment refers to CEDAW/Women's Empowerment Principles • Not Met: Commitment refers to Child Rights Convention/Business Principles • Not Met: Commitment refers to Convention on migrant workers • Not Met: Expects suppliers to respect these rights
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts • Not Met: Expects suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with suppliers on remedy: TFG London Migrant Workers Employment Policy and Implementation Guidelines indicates: 'As TFG London works to eliminate all forms of human trafficking and forced labour in our supply chain, we will encourage dialogue with our stakeholders, and we will partner closely with our Suppliers to support monitoring, remediation and capacity building to meet the standards'. The TFG London has published a Young Worker and Child Labour policy adds: 'Children must not be involved in any part of brands of TFG London' supply chain. However, if child labour is found, TFG London commits to continuing its business relationship with the supplier and providing them with support to develop responsible solutions that are in the best interests of the children'. However, it is a Company's segment. The Human Rights Statement has remedy provisions specifically on working hours within its supply chain. No Group-wide formal statement found committing it to work with supplier to remedy adverse impacts which are directly linked to the company's operations, products or services. [TFG London Young Worker and Child Labour policy, N/A: phase-eight.com] & [TFG London Migrant Workers Employment Policy and Implementation Guidelines, N/A: phase-eight.com]
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Company states that 'The Board determines and sets the tone for TFG's values, including principles of ethical business practice, human rights considerations and the requirements of being a responsible corporate citizen. Through the Social and Ethics Committee, the Board approves the TFG code of good ethical conduct based on responsibility, honesty, fairness and respect.' [King IV Application Register, 2022: tfglimited.co.za] • Not Met: Describes HRs expertise of Board member Score 2 <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Process to review HRs strategy at board level • Not Met: Example of HRs issues/trends discussed in last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions: The Company states that 'TFG is committed to a stakeholder-inclusive approach, based on the principle of shared value, thereby ensuring that all stakeholder issues have been identified, prioritised and appropriately addressed. The Board has approved a formal policy for stakeholder engagement in terms of which the Board, through the Social and Ethics committee, considers issues around stakeholder engagement and management. Through regular reporting by management to the Social and Ethics Committee and the Chairperson of that committee to the Board, the Board is equipped with the necessary information to enable it to take the legitimate interests and expectations of stakeholders into account in all decision-making. It is a business imperative that the Group understands and is responsive to the needs and interests of key stakeholders which includes: customers, employees, unions, shareholders, suppliers, governments, regulators and the communities in which TFG operates. Interaction with stakeholders takes place during the normal course of business at multiple levels across the Group.' However, no explicit mention was found of affected stakeholders or human rights experts being consulted on the Company's human rights decisions. [King IV Application Register, 2022: tfglimited.co.za]
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: At least one board member incentive linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HRs implementation and decision making: The Company indicates that 'Management has been delegated the responsibility for implementation and execution of the code of good ethical conduct'. However, no information was found which are the roles that are holding the responsibility. [King IV Application Register, 2022: tfglimited.co.za] Score 2 <ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: HRs risks integrated as part of enterprise risk system • Not Met: Provides an example

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risk management		Score 2 • Not Met: Risk assesment by Audit Committee or independent third party
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations Score 2 • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Describes steps to communicate HRs policies to supply chain • Not Met: Requires suppliers to communicate HRs policies Score 2 • Not Met: Describes how HRs policies are contractual/binding for suppliers • Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments • Not Met: Trains relevant managers including procurement on HRs Score 2 • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet HRs commitments • Not Met: Discloses % suppliers trained
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The Company states that 'The Board acts in the best interests of the company, taking into account its stakeholders, the environment and society as a whole, as well as considering risks and overseeing and monitoring implementation and execution of strategy by management, thereby ensuring accountability for the company's performance.' However, no information on the human rights policy commitments was found. [King IV Application Register, 2022: tfglimited.co.za] • Not Met: Discloses % of supply chain monitored • Not Met: Describes how workers are involved in monitoring Score 2 • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process • Not Met: Discloses findings and number of correction action processes
B.1.7	Engaging and terminating business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: HRs performance affects selection suppliers • Not Met: HRs performance affects continuation supplier relationships Score 2 • Not Met: Describes positive HRs incentives for business relationships • Not Met: Works with suppliers to meet HRs requirements
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes how workers and communities identified and engaged in the last two years: The Company states, about the communities and non-profit organisations, it states that 'In South Africa, the TFG Foundation serves as the vehicle through which we channel social investment activities in communities. Throughout the Group, our brands also make direct contributions to the communities in which they operate through direct brand-led corporate social investment initiatives aligned to our customers and the communities in which we operate.' However, no information was found on how the Company identifies communities. No information was found regarding workers. [2022 Integrated Annual Report, 2022: tfglimited.co.za] • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholders views influenced company's HRs approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations: The Company states that 'Risks and opportunities are identified throughout the year through regular interaction with the business and assessed on the likelihood of occurrence and the potential impact on the Group (risk exposure).' And, it states that ' Each business area is responsible for identifying, assessing and managing the risks in their respective area. Risks and opportunities are identified throughout the year through regular interaction with the business and assessed on the likelihood of occurrence and the potential impact on the Group (risk exposure).' However, human rights risks are not specified. [2022 Integrated Annual Report, 2022: tfglimited.co.za] & [King IV Application Register, 2022: tfglimited.co.za] Score 2 <ul style="list-style-type: none"> • Not Met: Describes process for identifying risks in business relationships • Not Met: Describes global risk identification system incl. stakeholder consultation: The Company outlines its general system for risk identification. However, human rights risks are not specified or mentioned. [2022 Integrated Annual Report, 2022: tfglimited.co.za] • Not Met: Describes how risk identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks • Not Met: Describes how process applies to supply chain • Not Met: Public disclosure of results of HRs risk assessment Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HRs issue Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company states that 'A whistle-blowing facility has been in place since February 1998. Whistle-blowing is encouraged through the outsourced Deloitte & Touché tip-off anonymous line, which is promoted among employees and suppliers. Reports are submitted to the Group Forensics department for investigation. The Audit Committee reviews material items to ensure appropriate follow-up and remedial action is taken. Significant issues, including fraud, are reported to the Supervisory Board. If you become aware of any fraudulent (or potentially fraudulent) activity or any actual or potential abuse of human rights committed by TFG employees or suppliers, please report the matter through our independent whistle-blowing facility managed by Deloitte Tip-offs Anonymous.' [2022 Inspiring Living Report, 2022: tfglimited.co.za] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware • Met: Describes how workers in supply chain access grievance mechanism: The Company states that reports can be made by anyone and that conduct of TFG suppliers is covered as well. [2022 Inspiring Living Report, 2022: tfglimited.co.za] • Not Met: Expects suppliers to convey expectation to their suppliers
C.2	Grievance mechanism(s) for external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism accessible to all external individuals and communities: The Company has in place a Whistleblowing facility where concerns about human rights violations can be raised. However, it is only promoted among employees and suppliers. No information was found on whether external stakeholders have access to it as well. [2022 Inspiring Living Report, 2022: tfglimited.co.za] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Not Met: Describes how external individuals/communities access grievance mechanism • Not Met: Expects supplier to convey expectation to their suppliers
C.3	Users are involved in the design and performance of the mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes procedure and timescales for managing complaints or concerns • Not Met: Describes technical, financial, advisory support to enable equal access <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators
C.5	Prohibition of retaliation for raising complaints or concerns	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public statement prohibiting retaliation against workers/stakeholders • Not Met: Describes practical measures to prevent retaliation <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The Company discloses that it had '3 material calls received and acted upon by RAG' however, the addressing and the outcome achieved is not disclosed. Furthermore, this information applies only to TFG Australia. No information covering the entire operation of the Company was found. [2022 Inspiring Living Report, 2022: tfglimited.co.za] • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The Company states that 'All workers shall be paid no less than the minimum wage required by applicable laws or industry or local wage standards where there is no legal minimum wage and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to workers, in accordance with receiving country law, and shall not be delayed, deferred, or withheld.' Besides that, it states that 'Suppliers shall respect the right of employees to a living wage and ensure that wages are for a normal working week shall always meet at least the minimum wage required by local law or the prevailing local industry wage (whichever is higher). In any event, wages should always be enough to meet basic needs and to provide some discretionary income.' However, TFG London is a Company segment. No information covering the whole Company was found. [TFG London Migrant Workers Employment Policy and Implementation Guidelines, N/A: phase-eight.com] & [TFG London Supplier Code of Conduct, N/A: phase-eight.com] • Not Met: Describes work with suppliers on living wage <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes practices to avoid price or short notice requirements that undermine HRs: The Company states that 'Purchasing practices can prevent supplier compliance with company codes of conduct and put at risk the lives and dignity of workers in supply chains. While poor purchasing practices have led to many problems, including child labour and employee retrenchment [...]' and as steps to comply with it, it states that is committed to make 'Whistles voluntarily participated in the Better Buying programme, a global initiative that provides retailers, brands, and suppliers a cloud-based platform to obtain data-driven insights into purchasing activities. Better Buying's transparency fosters sustainable partnerships and mutually beneficial financial results and other outcomes. Anonymous supplier ratings of buyer purchasing practices are aggregated, scored, and made available to the participating retailers, brands, and suppliers with the goal of accelerating change and industry-wide improvements across supply chains. Whistles benefited from the Better Buying Responsible Purchasing Workshop. The objective of the workshop was to raise awareness on the link between purchasing practices and labour standards in our supply chain and to develop a strategy and action plan.' However, this statement applies to TFG London, which is only a segment of the Company. No information covering the entire Company was found, including specific practices adopted. [2021 - 2022 Modern Slavery Transparency Statement, 2022: tfglondon.com] • Not Met: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices
D.2.3	Mapping and disclosing the supply chain	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifies direct and indirect suppliers including manufacturing sites: The Company indicates that TFG Africa had '100% tier 1 apparel and soft accessories suppliers mapped' (Supplier that receives and manages the order including CMT factories, design and trading houses) and '77% of tier 2 suppliers for TFG Design and Manufacturing fabric suppliers mapped'. As for TFG London: Tier 1: fully mapped (supplier - Primary production site for assembly of finished goods before being shipped to brand. Includes processes such as cutting, stitching, quality control and packing); Tier 2: partially mapped (suppliers: 'Dye-houses where fabric is dyed and finished (if not at fabric mill). Fabric mills where yarn is woven/ knitted into fabric. Trims include buttons, zips and labels. Subcontractors and homeworking include secondary processes conducted outside of the primary production site such as embroidery, embellishment, printing and in some cases, stitching'). Regarding TFG Australia: Tier 1: fully mapped (suppliers - Final stage production by a factory that cuts, trims and/or sews.); Tier 2: Partially mapped (suppliers - Fabric production by fabric mills, dye houses, wash houses, labelling, hanger suppliers and cartons); Tier 3: Mapping project initiated (suppliers - Raw material suppliers including cotton, polyester, viscose, leather and linen). [2023 Inspired Living Report, 2023: tfglimited.co.za] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on child labour in supplier codes and contracts: The Company has the 'TFG London Young Worker and Child Labour policy' that defines what the company expects of its suppliers to comply with in the contracts. Besides that, the Company states that 'TFG London expects suppliers to monitor their own supply chains and to contact TFG London and its brands immediately if they have any concerns regarding young workers or child workers. In return, if instances of child labour are identified, TFG London commits to supporting and working with suppliers to develop responsible solutions that are in the best interests of the children.' And 'Children must not be involved in any part of brands of TFG London' supply chain. However, if child labour is found, TFG London commits to continuing its business relationship with the supplier and providing them with support to develop responsible solutions that are in the best interests of the children.' <p>However, TFG London is only a segment of the Company. No information covering the entire Company was found. [TFG London Young Worker and Child Labour policy, N/A: phase-eight.com]</p> • Not Met: Describes work with suppliers on eliminating child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of child labour in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on debt/fees in supplier codes and contracts: The Company states that 'Supplier shall ensure that migrant workers do not pay any fees, expenses, or deposits in connection with their employment-this includes monthly service fees charged by third party labour brokers to migrant workers over the course of their employment. Exceptions to this policy may include cost of transportation from the worker's home directly to the recruitment centre or embarkation point and passport fees directly chargeable to workers in accordance with local law. The fees and expenses provision shall be clearly communicated to foreign workers in a language they understand at the beginning of the recruitment process prior to departure from their country.' However, TFG London is only a segment of the Company. No information covering the entire Company was found. [TFG London Migrant Workers Employment Policy and Implementation Guidelines, N/A: phase-eight.com] • Not Met: Describes work with suppliers on debt/fees for job seekers/workers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts • Not Met: Describes work with suppliers on paying workers regularly, in full and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts • Not Met: Describes working with suppliers on free movement of workers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Requirements on FoA/CB in suppliers codes and contracts: The 2022 Inspiring Living Report discloses information on the Company's commitment to the UNGC which includes: 'Have the freedom of association and effective recognition of the right to collective bargaining'. It also discloses the Company's progress in relation to this principle: 'Bargaining is done collectively within the unionised countries e.g. Zambia, Lesotho and South Africa'. However, it is not clear the measures it puts in place to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the right to form and join a trade union of their choice (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law). [2022 Inspiring Living Report, 2022: tfglimited.co.za] Not Met: Describes work with suppliers on FoA/CB Score 2 <ul style="list-style-type: none"> Not Met: Assessment of scope of restriction of FoA/CB in supply chain Not Met: Analysis of trends demonstrating progress
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Requirements on H&S in supplier codes and contracts Not Met: Discloses injury rate or lost days in supply chain in last reporting period: The Company discloses information regarding the number of days lost per year: 2018 (1968 days), 2019 (3653 days), 2020 (3567 days), 2021 (2982 days), 2022 (2062 days). However, it is not clear if this includes incidents from the supply chain. [2022 Inspiring Living Report, 2022: tfglimited.co.za] Not Met: Discloses fatalities for workers in supply chain in last reporting period: The Company states that there were 0 (zero) fatalities since 2018. however, it is not clear if this includes incidents from the supply chain. [2022 Inspiring Living Report, 2022: tfglimited.co.za] Not Met: Discloses occupational disease rate in supply chain in last reporting period Score 2 <ul style="list-style-type: none"> Not Met: Describes work with suppliers of H&S Not Met: Assessment of scope of H&S issues in supply chain Not Met: Analysis of trends demonstrating progress
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Requirements on women's rights in contracts/codes with suppliers Not Met: Describes work with suppliers on women's rights Score 2 <ul style="list-style-type: none"> Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain Not Met: Analysis of trends demonstrating progress
D.2.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Requirements on working hours in codes/contracts with suppliers Not Met: Describes work with suppliers on working hours Score 2 <ul style="list-style-type: none"> Not Met: Assessment of scope of excessive working hours in supply chain Not Met: Analysis of trends demonstrating progress

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 3.67 out of 80 points scored in themes A-D has been applied to produce a score of 0.92 out of 20 points for theme E.

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